

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: PHILIPS RECALLED CPAP, BI- LEVEL PAP, AND MECHANICAL VENTILATOR PRODUCTS LITIGATION,</b>	)	
	)	Master Docket: Misc. No. 21-1230
	)	
	)	MDL No. 3014
	)	
<b>This Document Relates to:</b>	)	(Oral Argument Requested)
	)	
<i>Second Amended Master Long Form</i>	)	
<i>Complaint for Personal Injuries and</i>	)	
<i>Damages, and Demand for Jury Trial (ECF</i>	)	
<i>No. 2505 / 2511 (under seal))</i>	)	

**PLAINTIFFS' RESPONSE IN OPPOSITION TO PHILIPS RS  
NORTH AMERICA LLC'S MOTION TO DISMISS PURSUANT TO  
FEDERAL RULES OF CIVIL PROCEDURE 12(b)(1) AND 12(b)(6)**

Plaintiffs hereby file this Response in Opposition to Philips RS North America LLC's Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) (ECF 2573), for the reasons set forth in the accompanying Brief in Opposition.

DATED: April 10, 2023

Respectfully submitted,

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